

Allied-Signal Inc. P.O. Box 13 Danville, IL 61834 Telephone (217) 446-4700 US EPA RECORDS CENTER REGION 5



1002078

May 9, 1989

Mr. Robert A. Fuhrer United States Environmental Protection Agency Region V (5HR-13) 230 S. Dearborn Chicago, IL 60604

Dear Mr. Fuhrer:

With regards to questions raised at your Visual Site Inspection at our facility on April 25, I am enclosing information concerning the I.E.P.A. approved closure for #3 surface impoundment, the Geraghty & Miller and Weston reports dealing with the carbon tetrachloride monitoring/remediation operating under the I.E.P.A. voluntary clean-up program and the EP toxicity data for our deepwell effluent stream.

Construction of the deepwell began on July 24, 1972 and was completed into the Mt. Simon formation on October 6 of the same year. Recompletion of the well to the Eminence-Potosi was on November 27, 1973.

The storage tank involved in the carbon tetrachloride leak incident was cleaned and cut up for scrap in June, 1980. The replacement tank was put into service sometime in 1979.

Please contact me if you have any questions or require additional information.

Sincerely,

Gregory L. Barrett

Supervisor Pollution Congrol/Safety

y L. Banell

GLB: pks

Attachments





This facility is closing SO1. (SO1, SO2, and TO4 have already been deleted from our print-out.) Because our print-out shows no SO1, and since the enclosed documents indicate that the facility's closure has been certified, it appears that the closure process has been completed. (Karen Nachtwey of IEPA, however) was not aware of this. The attached letter certifies that no wastes were ever stored in tanks longer than 90 days. Elsewhere in the file it is explained that the TO4 is part of the facility's injection well system. Therefore, the facility's only code is D79. Since this has also somehow been deleted from our print-out, it should be restored.

217/782-4762

Refer to: 1838040027 -- Vermillion County

Damville/Allied Corporation

Closure Plan Approved: April 8, 1985

ILD005463364

Hovember 75, 1985

Hr. Richard L. Purgasor Allied Corporation Post Office Box 13 Danville, Illinois 61832

Pear Mr. Purdason:

check latersee if insp. was done 125

Loc #63

Certification that the Allied Corporation drum storage area had been closed in accordance with the approved closure plan by the owner/operator, yourself, and an independent registered professional engineer. Michael F. Johnson, P.F., of Illinois was received at this Agency October 29, 1985.

The Agency has determined that the closure of the drain storage area has met the requirements of Interim Status Standards, 35 111. Admin. Code, Part 725 (60 CFR, Part 265).

This facility must continue to meet the applicable requirements of 35 III.

Adm. Code 722 - Standards Applicable to Generators of Hazardous Naste (40 CFR 262) and until your Part A is withdrawn, all applicable requirement of 35 III.

Adm. Code 725 - Interim Status Standards for Owners and Operations of Hazardous Waste Treatment, Storage and Disposal Facilities.

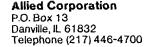
If you have any questions, please contact Karen Nachtwey at 217/782-0892.

Yery truly yours.

Lawrence W. Festep, P.E., Manager Permit Section Division of Land Pollution Control

LIFE: KER: fab/2543E/25

cc: Division File
Central Region
USEPA Pegion V. Ann Budich
Michael E. Johnson, P.E.
Financial Assurance Unit





October 28, 1985

Mr. Richard Carlson - Director Illinois Environmental Protection Agency Division of Land Pollution Control 2200 Churchill Road Springfield, Illinois 62706

REGEIVED

DCT 3 1 1985

RE: ALLIED CORPORATION, DANVILLE WORKS
CONTAINERIZED STORAGE AREA CLOSURE

SWB - AIS U.S. EPA, REGION V

Dear Sir:

1LD005463344 G, TSD, UIC, PA, 9

On October 3, 1985 the subject storage area was closed. I hereby certify this facility was closed according to our IEPA approved closure plan with the exception of the amount of waste disposed at time of closure and the disposal sites used. These changes were approved by David Jansen, IEPA, on 7/30/85.

The changes are as follows:

WASTE STREAM/QTY

DISPOSAL SITE/TYPE

Arsenic contaminated waste/ 9 drums

SCA Services, Inc. Ft. Wayne, IN./landfill

Ignitable Waste, liquid/ 4 drums

Trade Waste Incineration Sauget, IL./incinerator

Waste degreasing solvents/ 1 drum

Waste carbon tetrachloride/ 6 drums

Closure costs were approximately \$5600. An independent registered professional engineer witnessed closure. His certification is given in Attachment I.

At the suggestion of David Jansen, IEPA, we have revised our Part A Permit Application to more accurately describe our current operation. This revision, (Attachment II) indicates hazardous waste will not be stored greater than 90 days nor will hazardous waste be treated at this facility. The hazardous waste storage tanks listed in our November 14, 1980 Part A Application have only been used to hold wastes for less than 90 days since November, 1980 (refer to our correspondence of 1/17/85). As such, the TSD features of the permit for these tanks have never been used, and we as a protective filer now wish to terminate any existing interim status for these tanks.

The Snly TSD facility now specified in the revised Part A permit application is the operation of an on-site injection well. However, this well is now primarily regulated by the Illinois UIC Program and operated under UIC permit by rule. We have retained the listing of the injection well (D79) in our application as required by Section 3005 (e) of the Resource Conservation and Recovery Act. A UIC permit application was submitted to IEPA in June, 1985.

As a Plant Manager of a a production facility having a gross annual sales or expenditures exceeding \$25 million (in second quarter 1980 dollars) and having been delegated authority from an Allied Corporation Officer, I have authority to sign this application.

Please contact George Kady of my staff if you have any questions.

Sincerely,

Richard L. Purgason Plant Manager

RLP:cmm

cc: EPA Region V RCRA Activities
P. O. Box A3587
Chicago, Illinois 60690

David Jansen
Illinois Environmental Protection Agency
Field Operations Section
Division of Land Pollution Control
4500 South Sixth Street Road
Springfield, Illinois 62706

Karen Nachtwey
Illinois Environmental Protection Agency
Division of Land Pollution Control
Permit Section
2200 Churchill Road
Springfield, Illinois 62706

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ADVANCED WASTE MANAGEMENT, INC.

Harlan Road Route 22 Box 294A ● Terre Haute, Indiana 47802 ● 812-299-9547

October 8, 1985

Mr. Richard Carlson Director, Illinois EPA 2200 Churchill Road Springfield, Illinois 62706

Reference: Title 35 Environmental Protection

Subtitle G: Waste Disposal Chapter I, Part 725.215 Certification of Closure

1838040027 -- Vermillion County Danville/Allied Chemical Company

ILD 005463344 Log #63

Dear Mr. Carlson:

In accordance with Section 725.215 cited above, the following statements are provided concerning Log #63, Closure Plan for Allied Corporation, Danville Works. Prepared by Mr. G. M. Kady, Supervisor Safety/Pollution Control. Original issued 2/81, revised 3/85.

On Thursday, Ocotber 3, 1985, this writer inspected the drum storage area; a 25' by 25' reinforced concrete pad, which is surrounded by a 6" curb and covered by a roof. This drum storage area was closed in complete compliance with the procedures outlined on page 5 of the above referred closure plan.

If you have any questins or comments, plase write or call.

Sincerely,

ADVANCED WASTE MANAGEMENT, INC.

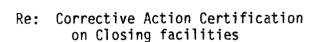
lichael F. Johnson, P.E.

Manager

MEJ: 1h

CERTIFIED MAIL *P 602 533 529
RETURN RECEIPT REQUESTED

Lawrence Eastep, Manager Permit Section, DLPC Illinois EPA 2200 Churchill Road Springfield, Illinois 62706



Dear Mr. Eastep:

On June 13, 1985, you sent U.S. Environmental Protection Agency (U.S. EPA) a list of 44 facilities which had submitted closure plans to Illinois Environmental Protection Agency (IEPA). U.S. EPA was to send corrective action letters regarding closure to these facilities. Of the 44 facilities, 22 had previously been sent corrective action letters. Therefore, only the 22 facilities listed below were sent the corrective action letter concerning closing facilities on July 29, 1985:

Airtex Products	ILD 001662816	John Deere Foundry	ILD 075607119
Allied Chemical	ILD 005463344	Lenz Oil	ILD 005451711
Appollo Metals	ILD 087542650	Matheson Gas	ILD 005115753
Birimingham Bolt	ILD 980996862	Midland-Ross	ILD 072317761
Drawn Metal Prod.	ILD 000768671	Midwest Plating	ILD 025494246
Elco Industries	ILD 005129945	Packard Instrument	ILD 005146717
Eng. Coated Prod.	ILD 068474747	Park Plating & Metal	ILD 005431101
Flint Ink Corp.	ILD 006537245	Precision National	ILD 047731112
Gardner-Denver Petro.	ILD 006306856	Southern Illinois Univ.	ILD 071965214
General Tire & Rubber	ILD 068556422	Sundstrand	ILD 010219665
Ind. Drum & Container	ILD	Travenol Laboratories	ILD 000666180

Attached find copies of the corrective action responses received to date from the above listed facilities. Responses are from 11 facilities:

Allied Chemical Apollo Metals Birmingham Bolt John Deere Foundry Engineered Coated Prod. Gardner-Denver Petro. General Tire & Rubber Michael Ross Page Instrument Southern Illinois Univ. Travenor Laboratories	ILD 005463344 ILD 087542650 ILD 980996862 ILD 075607119 ILD 068474147 ILD 006306856 ILD 068556422 ILD 072317761 ILD 005146717 ILD 071965214 ILD 006666180	
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Please contact Mr. Horst Witschonke, at (312) 886-0987, for further assistance regarding these facilities.

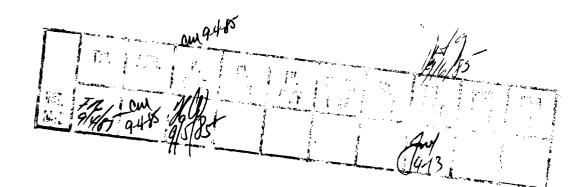
Sincerely yours,

Edith M. Ardiente, P.E. Chief, Technical Programs Section

Attachments

bcc: Horst Witschonke, TPS Jodi Traub, SPU#1

5HS-12:H.Witschonke:fr:9/3/85



KEN



217/782-6762

Log No. 63 Received: March 18, 1985

Refer to: 1838040027 -- Vermilion County Danville/Allied Chemical Company ILD 005463344

April 8, 1985

Mr. Richard L. Purgason, Plant Manager Allied Chemical Company Post Office Box 13 Danville, Illinois 61832

Dear Mr. Purgason:

The closure plan submitted by G.J. Kady has been reviewed by this Agency. Your final closure plan to close the hazardous waste drum storage (SOI) area is hereby approved.

1. When closure is complete the owner or operator must submit to the Director certification both by the owner or operator and by an independent registered professional engineer that the facility has been closed in accordance with the specifications in the approved closure plan. These certifications must be received at this Agency within 30 days after closure. All certifications, logs, or reports which are required to be submitted to the Agency by the facility should be mailed to the following address:

> Illinois Environmental Protection Agency Division of Land Pollution Control Permit Section 2200 Churchill Road Springfield, Illinois 62706

- 2. The approval of this plan is further subject to the following conditions:
 - This facility must continue to meet the applicable requirements of 35 1. IAC Part 722 - Standards Applicable to Generators of Hazardous Waste and Part 723 - Standards Applicable to Transporters of Hazardous Waste.
 - 2. The approval of this partial closure plan does not relieve Allied Chemical Company of the responsibility of providing financial assurance for the remainder of the facility which is subject to closure, in accordance with 35 Ill. Admin. Code Part 725.243.



OCT 28 1985

SOLID WASTE BRANCH U.S. EPA, REGION V



Page 2

Should you have any questions regarding this manner, please contact Karen Nachtwey at 217/782-0892.

Very truly yours,

Lawrence W. Eastep, P.E., Manage

Permit Section

Division of Land Pollution Control

LWE:KEN:sd/710e/4-5

cc: Central Region Division File

Financial Assurance Unit

G.J. Kady, P.E.

USEPA Region V,-- Ill. S10 USEPA Region V -- Jodi Traub

Bill Radlinski



Specialty Chemicals Division P.O. Box 13 Danville, Illinois 61832 (217) 446-4700

March 5, 1980

Mr. Rauf Piskin, Manager Hydrogeology Unit Technical Operations Section Division of Land/Noise Pollution Control 2200 Churchill Road Springfield, Illinois 62706

Re: Permit No. 1979-UIC-3-OP-2

Dear Mr. Piskin:

In reply to your letter dated February 19, 1980 (comments on Supplemental permit application to close waste holding pond) we offer the following:

- The liquid waste in the pond will be drained and disposed of via the deepwell.
- We do not propose to fill in the pond with inert fill material within the dike walls. Rather, the pond closure design will involve first filling in the ditch that surrounds the pond with a clean fill, and then reducing or pushing in the pond walls. After this leveling operation is complete, the sealing layer and cover will be applied per the drawing previously submitted. The slope of the final cover will not exceed 10% per your recommendation.
- 3. We propose to monitor the groundwater in the vicinity of the pond by sampling and analyzing the existing wells, W-6, W-8, W-10 and W-12 on a quarterly basis. These wells are included in the current monitoring program.
- 4. The final cover of the pond and monitoring wells will be inspected on a quarterly basis. Any erosion or settling of the pond cover will be repaired as required. Any damage or plugging of the monitoring wells will be remedied as required.

If you have any questions, please telephone me.

Very truly yours,

WCA Schrode /QWB

W. C. A. Schrader Plant Manager

WCAS: cmm

cc: Illinois State Water Survey
P. O. Box 232
Urbana, Illinois 61801

Illinois State Geological Survey Natural Resources Building University of Illinois

Urbana, Illinois 61801

To: Mr. Rauf Piskin

bcc: R. Sobel - MTO

A. L. Schwartz - MTO

D. L. Hatfield

R. L. Purgason

N. A. Lanter

Geraghty & Miller, Inc.

CONSULTING GROUND WATER GEOLOGISTS AND HYDROLOGISTS

North Shore Atrium 6800 Jericho Turnpike Syosset, New York 11791 Cable: WATER

Telephone: 516/921-6060

January 18, 1980

Mr. Dennis L. Hatfield Regional Manager Environmental Control Chemicals Company Allied Chemical 12260 S. Carondolet Avenue Chicago, Illinois 60633

Dear Mr. Hatfield:

We are pleased to send our comments on your closure plan for the effluent pond at the Danville, Illinois plant. We have reviewed it with reference to ground water protection and the prevailing hydrogeologic conditions at the site.

Our site study as described in the September 1979 report established that the horizontal permeability of the glacial materials was only 3.7 x 10⁻⁷ cm/sec (7.9 x 10⁻³ gpd/sq ft). The ground water has a very shallow gradient, and the combination results in a ground-water flow velocity of about 1.5 cm/yr (0.6 in/yr). The extremely low flow rate has effectively prevented contaminants from leaving the plant property and has confined the strongest contamination to the main plant area. Since the contaminants are in a virtually static ground-water system, and Allied owns a considerable distance around the contaminated zone, migration of the contaminant to adjoining property does not appear possible in a meaningful time frame.

The ground-water sampling program has shown no signs that mounding of the water table occurred or that contaminant plumes developed. This is significant because under conditions of such low permeability and gradient, an anomalously high recharge would produce a mound in the water table. The absence of such a mound indicates that downward leakage is negligible, and there is no contact between the effluent pond and the ground water. Another factor confirming these conditions is the lack of a plume of contamination that otherwise would have been expected.

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The specifications for final cover follow the proposed rules of the Resource Conservation and Recovery Act as referenced on the drawing. A cover of about 27,000 $\rm ft^2$ with the permeability of 1 x 10⁻⁷ cm/sec, if inundated with 1 foot of water, would leak at a rate of about 58 gpd. However, the cover is sloped and should never support a head of water more than a fraction of an inch deep. That condition is also unlikely to persist for more than a few hours at a time. The net result is that penetration of water through the clay layer is highly unlikely.

The elevation of the effluent pond bottom is sufficiently above the water table that water table fluctuations are not expected to produce a contact between the two. The cover is designed in a manner that should prevent infiltration of meteoric water beyond the depth of the clay layer. Since liquids will not be added to or generated by materials in the effluent pond, the contents should be effectively isolated from percolating water.

In conclusion, we believe that the plan as illustrated in the closure drawing should be effective in preventing further contamination of ground water from the effluent pond.

Sincerely,

GERAGHTY & MILLER, INC.

John Isbister Vice President

JI:ka